



STATE OF IDAHO
DIVISION OF
ENVIRONMENTAL QUALITY

224 South Arthur • Pocatello, Idaho 83204-3202 • (208) 236-6160

Dirk Kempthorne, Governor
C. Stephen Allred, Administrator

June 2, 2000

CERTIFIED MAIL #Z 271 710 114

Robert G. Bloom
Accounting and Services Manager
Lamb-Weston, American Falls
P.O. Box 489
American Falls, Idaho 83211

RE: T2-000003 Lamb Weston, American Falls
(Potato Processor)

Dear Mr. Bloom:

On February 7, 2000, Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) received an application for an amendment to your Tier II Operating Permit. Based on review of your application and state and federal rules and regulations, DEQ finds this proposal meets the requirements for Tier II Operating Permits, per IDAPA 16.01.01.400 (*Rules for the Control of Air Pollution in Idaho*). Enclosed is your amended Tier II Operating Permit.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street - 10th Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision. However, DEQ encourages you to contact the Pocatello Regional Office to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

You are strongly encouraged to request a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Mr. Rick Elkins, Air Quality Science Officer of the Pocatello Regional Office will contact you regarding this meeting. DEQ strongly recommends that, in addition to your facility's plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions be present during the meeting.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Mr. Rick Elkins at (208) 236-6160.

Sincerely,

Audrey Cole
Pocatello Regional Administrator
Department of Environmental Quality

Enclosure

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cc: DEQ State Office *De*

Pocatello Regional Office

STATE OF IDAHO AIR POLLUTION OPERATING PERMIT GENERAL INFORMATION	<div style="text-align: center;"> PERMIT NUMBER <div style="display: flex; justify-content: center; gap: 10px;"> <div style="border: 1px solid black; padding: 2px 5px;">0</div><div style="border: 1px solid black; padding: 2px 5px;">7</div><div style="border: 1px solid black; padding: 2px 5px;">7</div> - <div style="border: 1px solid black; padding: 2px 5px;">0</div><div style="border: 1px solid black; padding: 2px 5px;">0</div><div style="border: 1px solid black; padding: 2px 5px;">0</div><div style="border: 1px solid black; padding: 2px 5px;">1</div><div style="border: 1px solid black; padding: 2px 5px;">7</div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> AQCR <div style="border: 1px solid black; padding: 2px 5px;">0</div><div style="border: 1px solid black; padding: 2px 5px;">6</div><div style="border: 1px solid black; padding: 2px 5px;">1</div> </div> <div style="text-align: center;"> CLASS <div style="border: 1px solid black; padding: 2px 5px;">A</div><div style="border: 1px solid black; padding: 2px 5px;">2</div> </div> <div style="text-align: center;"> SIC <div style="border: 1px solid black; padding: 2px 5px;">2</div><div style="border: 1px solid black; padding: 2px 5px;">0</div><div style="border: 1px solid black; padding: 2px 5px;">3</div><div style="border: 1px solid black; padding: 2px 5px;">7</div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> ZONE <div style="border: 1px solid black; padding: 2px 5px;">1</div><div style="border: 1px solid black; padding: 2px 5px;">2</div> </div> <div style="text-align: center;"> UTM COORDINATE (km) <div style="border: 1px solid black; padding: 2px 5px;">3</div><div style="border: 1px solid black; padding: 2px 5px;">4</div><div style="border: 1px solid black; padding: 2px 5px;">3</div> . <div style="border: 1px solid black; padding: 2px 5px;">4</div> . <div style="border: 1px solid black; padding: 2px 5px;">4</div><div style="border: 1px solid black; padding: 2px 5px;">7</div><div style="border: 1px solid black; padding: 2px 5px;">3</div><div style="border: 1px solid black; padding: 2px 5px;">6</div> . <div style="border: 1px solid black; padding: 2px 5px;">2</div> </div> </div>	
1. PERMITTEE Lamb-Weston, Incorporated (American Falls)		
2. PROJECT Tier II Operating Permit		
3. ADDRESS 2975 Lamb Weston Road	TELEPHONE # (208) 226-2301	COUNTY Power
4. CITY American Falls	STATE Idaho	ZIP CODE 83211
5. PERSON TO CONTACT Bob Bloom	TITLE Accounting Manager	
6. EXACT PLANT LOCATION North Lat: 42 Deg., 46 Min., 10 Sec. West Long: 112 Deg., 54 Min., 30 Sec.		
7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS Processing for Frozen and Dehydrated Potato Products		
8. GENERAL CONDITIONS <p>This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.</p> <p>THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND DIVISION OF ENVIRONMENTAL QUALITY'S (DEQ) TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEQ REVIEW IN ACCORDANCE WITH SECTION 16.01.01.200 OF THE Rules for the Control of Air Pollution in Idaho.</p>		
		ISSUED DATE <u>June 2, 2000</u>
ADMINISTRATOR, POCA TELLO REGIONAL OFFICE DIVISION OF ENVIRONMENTAL QUALITY		EXPIRATION DATE <u>June 2, 2005</u>

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

0	7	7	-	0	0	0	1	7
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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE
GENERAL PLANT DESCRIPTION
1. SOURCE DESCRIPTION
1.1 Process Description

The Lamb-Weston, Inc., American Falls facility, is a potato processing facility, which produces frozen fried potato products, hashbrown, and dehydrated potato flakes. There are four (4) processing lines, and these are as follows:

- 1.1.1 Frozen Fried Product Line 1;
- 1.1.2 Frozen Fried Product Line 2;
- 1.1.3 Hashbrown Product Line; and
- 1.1.4 Dehydrated Product Line.

Each process line begins with the truck delivery of raw potatoes from offsite or from onsite storage areas. Potatoes are unloaded in an enclosed building, where cleaning and primary washing are conducted. The washed potatoes are then sized and transported by conveyors to holding bays in preparation for the various processes in each line.

The facility utilizes natural gas fuel burning equipment for the generation of process steam, heating, and drying.

Emission sources from the facility are fuel burning equipment such as the boilers, air makeup units (AMUs), space heaters and gas fired line dryer. Fryers and steam dryers are also emission sources. Fugitive particulate emissions are also generated by receiving, transfer, and shipping operations of raw materials and finished product.

2. OPERATING REQUIREMENTS
2.1 General Operating Requirements

- 2.1.1 Flake drum dryers #1 and #2 shall have a total maximum output of 38 tons per day (T/day), or 9,120 tons per year (T/yr).
- 2.1.2 Line fryers #1 and #2 shall have a total maximum output of 931 tons per day (T/day), or 223,440 tons per year (T/yr).
- 2.1.3 The total natural gas consumption of all fuel burning equipment shall not exceed 1,099 MMcf per year, on an annual rolling basis, and as per applicant's submittal.

ISSUED: June 2, 2000 EXPIRES: June 2, 2005

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SOURCE

FROZEN FRIED PRODUCT LINE 1 - LINE 1 DRYER (STEAM-HEATED), LINE 1 FRYER

1. SOURCE DESCRIPTION
1.1 Process Description

A pre-determined blend of clean, raw potatoes are drawn from the holding bays and are sized, then peeled. The peeled potatoes are then trimmed, preheated, cut, wet graded, sorted, and then fed to the defect removal equipment, where defective material is removed and routed to the hopper waste. Undersized cuttings are routed to the dehydrated flake product line.

The sorted product is blanched in hot water then is fed to a steam-heated dryer from which it leaves in a "nearly dry" state. From the dryer, the potato product goes to the fryer, then to a freeze tunnel and frozen graders. Finally, the product goes to packaging, after which it is placed on pallets and then put in cold storage.

Emissions from the Line 1 fryer exit the process through a Ducon scrubber, which shares a common exit point with the Line 2 fryer. The scrubber uses a water droplet bath to remove oil droplets in the fryer exhaust for subsequent collection in the water sump.

The blancher and the peeler vent only process steam.

1.2 Control Description
1.2.1 Line 1 Steam-Heated Dryers

Emissions from the steam-heated dryers are uncontrolled.

1.2.2 Line 1 Deluge Fryer

Emissions from the Line 1 fryer are controlled by a scrubber with the following specifications:

Manufacturer:	Ducon
Model Number:	UW-3, Size 90
Max. Inlet Flow Rate:	26,000 acfm
Max. Outlet Flow Rate:	23,794 acfm
Pressure Drop:	1.0 inch H ₂ O
Wet Scrubber Flow:	45.0 gpm
Control Efficiency:	75%

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EXPIRES: June 2, 2005

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SOURCE

FROZEN FRIED PRODUCT LINE 1 - LINE 1 DRYER (STEAM-HEATED), LINE 1 FRYER

2. EMISSION LIMITS
2.1 Ducon Scrubber Exhaust Stack

Particulate Matter (PM) and PM-10 (as defined in IDAPA 16.01.01.006.71), emissions from the Ducon scrubber exhaust stacks of the fryer shall not exceed the pound per hour (lb/hr) or ton per year (T/yr) values listed in Appendix A.

2.2 Visible Emission Limits

Visible emissions from each of the Line 1 dryer stacks and the Ducon scrubber exhaust stack shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as per IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho), and as determined by using the Department's "Procedure's Manual for Air Pollution Control".

3. OPERATING REQUIREMENTS
3.1 Ducon Scrubber

- 3.1.1 The Ducon wet scrubber pressure drop shall be maintained within manufacturer's specifications.
- 3.1.2 The scrubbing media flowrate to the Ducon wet scrubber shall be maintained within manufacturer's specifications, with the exception that the manufacturer's recommended maximum scrubbing media flowrate may be exceeded.
- 3.1.3 Documentation of the manufacturer's pressure drop specifications and scrubbing media flow requirements shall be kept on-site and shall be made available to Department representatives upon request.
- 3.1.4 The Line 1 fryer shall not be operated without the Ducon scrubber.

4. MONITORING AND RECORDKEEPING REQUIREMENTS
4.1 Pressure Drop Monitoring

The Permittee shall install, calibrate, maintain, and operate pressure drop monitoring equipment to continuously measure the pressure drop across the Ducon scrubber to determine compliance with Section 3.1.1 of Frozen Fried Product Line 1 of this permit.

ISSUED: June 2, 2000 EXPIRES: June 2, 2005

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

FROZEN FRIED PRODUCT LINE 1 - LINE 1 DRYER (STEAM-HEATED), LINE 1 FRYER

4.2 Scrubbing Media Flowrate Monitoring

The Permittee shall install, calibrate, maintain, and operate a scrubbing media flowrate monitor to continuously monitor the scrubbing media flowrate to the Ducon wet scrubber to determine compliance with Section 3.1.2 of Frozen Fried Product Line 1 of this permit.

4.3 Data Recording

The Permittee shall monitor and record the following operating parameters in a log that shall be kept on-site for a minimum period of two (2) years and shall be made available to Department representatives upon request:

4.3.1 Pressure drop across the Ducon scrubber, once on a weekly basis; and

4.3.2 Scrubbing media flow rate to the Ducon scrubber, once on a weekly basis.

ISSUED: June 2, 2000
EXPIRES: June 2, 2005

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

FROZEN FRIED PRODUCT LINE 2 - LINE 2 DRYER (NATURAL GAS-FIRED), LINE 2 FRYER

1. SOURCE DESCRIPTION
1.1 Process Description

Raw potatoes are cleaned, sized, and peeled by a steam peeler. The peeled potatoes are then trimmed, cut, wet graded, sorted, and passed through defect removal equipment, then blanched (partially cooked) by immersion in hot water. Potato products are then dried by a natural gas-fired dryer. From the dryer, the products are transferred to the Line 2 fryer. Immediately after frying, the product is frozen, graded, packaged, and stored in a warehouse.

Emissions from the Line 2 fryer exit the process through a Ducon scrubber, which is a common exit point to the Line 1 fryer. The scrubber uses a water droplet bath to remove oil droplets in the fryer exhaust for subsequent collection in the water sump.

The peeler and blancher vent only process steam.

1.2 Control Description
1.2.1 Line 2 Natural Gas-Fired Dryers

Emissions from the Line 2 natural gas-fired dryer are uncontrolled.

1.2.2 Line 2 Deluge Fryer

Emissions from the Line 2 fryer are controlled by a scrubber with the following specifications:

Manufacturer:	Ducon
Model Number:	UW-3, Size 90
Max. Inlet Flow Rate:	26,000 acfm
Max. Outlet Flow Rate:	23,794 acfm
Pressure Drop:	1.0 inch H ₂ O
Wet Scrubber Flow:	45.0 gpm
Control Efficiency:	75%

2. EMISSION LIMITS
2.1 Line 2 Gas-Fired Dryer Stacks

Oxides of nitrogen (NO_x) emissions from all of the line 2 gas-fired dryer stacks shall not exceed the pound per hour (lb/hr) or ton per year (T/yr) values listed in Appendix A.

ISSUED: June 2, 2000
EXPIRES: June 2, 2005

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

FROZEN FRIED PRODUCT LINE 2 - LINE 2 DRYER (NATURAL GAS-FIRED), LINE 2 FRYER

2.2 Ducon Scrubber Exhaust Stack

Particulate Matter (PM) and PM-10 (as defined in IDAPA 16.01.01.006.71) emissions from the Ducon scrubber exhaust stacks of the fryer shall not exceed the pound per hour (lb/hr) or ton per year (T/yr) values listed in Appendix A.

2.3 Visible Emission Limits

Visible emissions from each of the Line 2 dryer exhaust stacks and the Ducon scrubber exhaust stack shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as required in IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho), and as determined by using the Department's "Procedure's Manual for Air Pollution Control".

3. OPERATING REQUIREMENTS
3.1 Line 2 Natural Gas-Fired Dryer
3.1.1 Fuel Specification

The Line 2 dryer shall burn natural gas fuel exclusively.

3.2 Ducon Scrubber

3.2.1 The Ducon wet scrubber pressure drop shall be maintained within manufacturer's specifications.

3.2.2 The scrubbing flow to the Ducon wet scrubber shall be maintained within manufacturer's specifications, with the exception that the manufacturer's recommended maximum scrubbing media flowrate may be exceeded.

3.2.3 Documentation of the manufacturer's pressure drop specifications and liquid flow requirements shall be kept on-site and shall be made available to Department representatives upon request.

3.2.4 The Line 2 fryer shall not be operated without the Ducon scrubber.

**ISSUED: June 2, 2000
EXPIRES: June 2, 2005**

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

FROZEN FRIED PRODUCT LINE 2 - LINE 2 DRYER (NATURAL GAS-FIRED), LINE 2 FRYER

4. MONITORING AND RECORDKEEPING REQUIREMENTS
4.1 Pressure Drop Monitoring

The Permittee shall install, calibrate, maintain, and operate pressure drop monitoring equipment to continuously measure the pressure drop across the Ducon scrubber to determine compliance with Section 3.2.1 of the Frozen Fried Product Line 2 of this permit.

4.2 Scrubbing Media Flowrate Monitoring

The Permittee shall install, calibrate, maintain, and operate a scrubbing media flowrate monitor to continuously monitor the scrubbing media flowrate to the Ducon wet scrubber to determine compliance with Section 3.2.2 of the Frozen Fried Product Line 2 of this permit.

4.3 The Permittee shall monitor and record the following operating parameters in a log that shall be kept on-site for a minimum period of two (2) years and shall be made available to Department representatives upon request:

4.3.1 Pressure drop across the Ducon scrubber, once on a weekly basis; and

4.3.2 Scrubbing media flowrate to the Ducon scrubber, once on a weekly basis.

ISSUED: June 2, 2000 EXPIRES: June 2, 2005

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE**HASH BROWN PRODUCT LINE****1. SOURCE DESCRIPTION****1.1 Process Description**

Raw potato from the evenflow hoppers are routed to a steam peeler and barrel washer to remove the peelings. The potatoes are then inspected, scrubbed, polished, and cut. After cutting, the potatoes are blanched and then chilled in water to about 50°F, and then routed to a hopper which then feeds potatoes to the shredders. The product is then transferred to either the patty or slab former. The formed products are then sent to a freeze tunnel. After freezing, the hashbrowns are sorted, packaged, placed on pallets, and then sent to the cold storage area.

The peeler and the blancher vent only process steam. Any regulated air pollutant emissions are expected to be below regulatory concern for permitting purposes.

ISSUED: June 2, 2000
EXPIRES: June 2, 2005

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

0 7 7 - 0 0 0 1 7

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

DEHYDRATED (FLAKE) PRODUCT LINE, DRUM DRYERS 1 & 2, KICE FILTER, & PNEUMAFIL FABRIC FILTER

1. SOURCE DESCRIPTION
1.1 Process Description

Raw potato screen-out from the hydro-sieve and undersized cuttings from Line 1 are routed to the flake holding tank. From the holding tanks, raw potatoes are transferred to the flake blancher, flake chiller, then cooked in the flake cooker, where steam is injected and additives are introduced.

The cooked product is then ground to a mash and fed to one of two (2) drum dryers, where it is rolled to a fine sheet of dehydrated potato. The dehydrated potato sheet is broken into smaller portions, transported through one of two (2) cyclones and then is either put into a tote for later use or run to a hammermill. The hammermill grinds the dehydrated product to the desired coarseness for either potato flakes or flour. From the hammermill, the product passes to the Kice collection system where different densities are separated for packaging.

1.2 Control Description
1.2.1 Drum Dryer #1 and Drum Dryer #2

Emissions from drum dryer #1 and drum dryer #2 are uncontrolled.

1.2.2 Kice Collection/Sizing System

Emissions from the Kice collection system (flake sizing) are controlled by the Kice fabric filter with the following specifications:

Manufacturer:	Ken Bratney Co.
Model:	Kice 21-8 Dust Collector
Air/Cloth Ratio:	7.855 to 1
Control Efficiency:	99.95%

1.2.3 Packaging System

Fugitive emissions from the packaging system and the flake process area are collected and controlled by a fabric filter with the following specifications:

Manufacturer:	Pneumafil Corporation
Model:	6.5-92-6
Air/Cloth Ratio:	8 to 1
Control Efficiency:	99.96% for particles > 1 Micron

ISSUED: June 2, 2000
EXPIRES: June 2, 2005

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

077 - 00017

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

DEHYDRATED (FLAKE) PRODUCT LINE, DRUM DRYERS 1 & 2, KICE FILTER, & PNEUMAFIL FABRIC FILTER

2. EMISSION LIMITS

2.1 Flake Line Pneumafil Fabric Filter

Particulate matter (PM) and PM-10 (as defined in IDAPA 16.01.01.006.71) emissions from the Flake Line Pneumafil exhaust shall not exceed the pound per hour (lb/hr) or ton per year (T/yr) values listed in Appendix A.

2.2 Kice Filter

Particulate Matter (PM) and PM-10 (as defined in IDAPA 16.01.01.006.71) emissions from the Kice filter exhaust stack shall not exceed the pound per hour (lb/hr) or ton per year (T/yr) values listed in Appendix A.

2.3 Flake Line Drum Dryer #1 and #2, Kice Filter, and Pneumafil Fabric Filter

Visible emissions from the drum dryer #1, drum dryer #2, Kice filter, and Pneumafil fabric filter stacks shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as per IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho) and as determined by using the Department's "Procedure's Manual for Air Pollution Control".

3. OPERATING REQUIREMENTS

3.1 Kice and Pneumafil Filters

3.1.1 The Kice and Pneumafil Filters shall at all times be maintained in good working order and shall be operated as efficiently as practical.

3.1.2 The Permittee shall develop for the Kice and Pneumafil Filters an operations and maintenance manual which will be followed to demonstrate that the filters are operated as efficiently as practical. The manuals shall include operating pressure drop requirements.

4. MONITORING AND RECORDKEEPING REQUIREMENTS

4.1 The Permittee shall install, calibrate, maintain, and operate pressure drop monitoring equipment to continuously measure the pressure drop across the Kice filter and the Pneumafil fabric filter to determine compliance with Sections 3.1.1 and 3.2.1 of the Dehydrated (Flake) Product Line of this permit.

4.2 The Permittee shall monitor and record the following operating parameters in a log which that shall be kept on-site for a minimum period of two (2) years and shall be made available to Department representatives upon request.

4.2.1 Pressure drop across the Kice filter, once on a weekly basis; and

4.2.2 Pressure drop across the Pneumafil fabric filter, once on a weekly basis.

ISSUED: June 2, 2000
EXPIRES: June 2, 2005

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

077 - 00017

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

FUEL BURNING EQUIPMENT - BOILER #1, BOILER #2, BOILER #3, BOILER #4, AMUs, AND SPACE HEATERS

1. SOURCE DESCRIPTION

1.1 Process Description

There are three (3) boilers for the supply of the facility's process steam and one (1) boiler for heat supply to the facility's fire system to prevent freezing during winter.

There are various sizes of AMUs (air makeup units) and other space heating equipment.

1.2 Control Description

1.2.1 Emissions from Boilers (#1, #2, #3, and #4) are uncontrolled.

1.2.2 Emissions from the AMUs and space heating equipment are uncontrolled.

2. EMISSION LIMITS

2.1 Boiler #1

2.1.1 NO_x Emission Limits

NO_x (oxides of nitrogen) emissions from the Boiler #1 exhaust stack shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) NO_x emission limits listed in Appendix A or 0.10 lb/MMBtu as required by 40 CFR 60.44b(a)(1)(i), whichever is more stringent.

2.1.2 PM and PM-10 Emission Limits

Particulate matter (PM) and PM-10 emission limits from Boiler #1 exhaust stack shall not exceed 0.015 gr/dscf corrected to three percent (3%) oxygen by volume, as per IDAPA 16.01.01.676 (Rules for the Control of Air Pollution in Idaho).

2.1.3 Visible Emission Limits

Visible emissions from the Boiler #1 exhaust stack shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as per IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho) and as determined by using the Department's "Procedure's Manual for Air Pollution Control".

2.2 Boilers #2, #3, and #4

2.2.1 PM and PM-10 Emission Limits

PM and PM-10 emission Limits from the exhaust stack of each boiler shall not exceed 0.015 gr/dscf corrected to 3% oxygen by volume, as per IDAPA 16.01.01.677 (Rules for the Control of Air Pollution in Idaho).

**ISSUED: June 2, 2000
EXPIRES: June 2, 2005**

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SOURCE

FUEL BURNING EQUIPMENT - BOILER #1, BOILER #2, BOILER #3, BOILER #4, AMUs, AND SPACE HEATERS

2.2.2 Visible Emission Limits

Visible emissions from the exhaust stack of each boiler shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as per IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho) and as determined by using the Department's "Procedure's Manual for Air Pollution Control".

2.3 AMUs and Space Heating Equipment

2.3.1 NO_x Emission Limits

NO_x (oxides of nitrogen) emissions from all the AMUs exhaust stacks or exhaust vent of all the space heating equipment shall not exceed any corresponding emission limit listed in Appendix B.

2.3.2 Visible Emission Limits

Visible emissions from any of the exhaust stack or vent of each space heating equipment shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as per IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho) and as determined by using the Department's "Procedure's Manual for Air Pollution Control".

3. OPERATING REQUIREMENTS

3.1 Boilers #1, #2, #3, and #4

3.1.1 Fuel Specification

Boilers #1, #2, #3, and #4 shall burn natural gas fuel exclusively.

3.2 AMUs and Space Heating Equipment

3.2.1 Fuel Specification

All AMUs and space heating equipment shall burn natural gas fuel exclusively.

4. MONITORING AND RECORDKEEPING REQUIREMENTS

4.1 Boiler #1 Performance Test

The Permittee shall conduct a performance test within sixty (60) days upon receipt of this operating permit to determine compliance with the NO_x (oxides of nitrogen) emission standard, as required in 40 CFR 60.46b(e), using the continuous system for monitoring NO_x, as specified in 40 CFR 60.48b(g)(1) or (2).

**ISSUED: June 2, 2000
EXPIRES: June 2, 2005**

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

077 - 00017

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

FUEL BURNING EQUIPMENT - BOILER #1, BOILER #2, BOILER #3, BOILER #4, AMUs, AND SPACE HEATERS

4.2 NO_x Emissions Monitoring for Boiler #1

As per 40 CFR 60.48b, the Permittee shall monitor NO_x emissions by the use of a continuous emissions monitoring system (CEMS) as specified in Section 4.2.1 of this permit, or by the use of an EPA approved predictive emissions monitoring plan, (PEMS), as specified in Section 4.2.2 of Fuel Burning Equipment of this permit.

4.2.1 NO_x CEMS Monitoring System

The Permittee shall install, calibrate, maintain, and operate a NO_x continuous emissions monitoring system (CEMS) for measurement of NO_x emissions in compliance with 40 CFR 60.48b (b), (c), (d), (e)(2), (e)(3), and (f).

The installation and initial performance evaluation of the CEMS shall be done in accordance with 40 CFR 60 Appendix B, performance specification 2. Procedures for installation, evaluation, operation of the CEMS shall be as specified in 40 CFR 60.13.

4.2.2 NO_x PEMS Monitoring System Plan

The Permittee shall monitor the boiler operating conditions and predict NO_x emission rates as specified in a NO_x predictive emissions monitoring system plan (PEMS), submitted to and approved by the U.S. Environmental Protection Agency (EPA) pursuant to 40 CFR 60.49b (c).

4.3 Monitoring of Boiler #1 Operating Parameters

The Permittee shall monitor and record the following, as specified in 40 CFR 60.49b(g):

4.3.1 Calendar date.

4.3.2 The average hourly predicted NO_x emissions in lb/MMBtu and lb/hr.

4.3.3 The 30-day average NO_x emission rates calculated at the end of each operating day from predicted hourly NO_x emission rates for the preceding 30 operating days.

4.3.4 Identification of boiler operating days when the average 30-day NO_x emission rates exceed the standard, with an explanation of the cause of the exceedance and the corrective action taken to remedy the cause of the exceedance.

4.3.5 Identification of the boiler operating days for which NO_x data have not been obtained, including the reasons for not obtaining sufficient data and a description of the corrective actions taken.

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PERMIT NUMBER

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SOURCE

FUEL BURNING EQUIPMENT - BOILER #1, BOILER #2, BOILER #3, BOILER #4, AMUs, AND SPACE HEATERS

4.3.6 A rundown of the times when data were excluded from the 30-day NO_x emission average calculations because of a unit start-up, shut-down, malfunction, or other reasons.

4.3.7 Applicable data as specified in 40 CFR 60.49b (g) (7), (8), (9), and (10).

4.4 Fuel Consumption Monitoring

The Permittee shall install, calibrate, maintain, and operate a natural gas flow monitoring equipment to monitor the following:

4.4.1 Total natural gas consumption of the facility.

4.5 The Permittee shall monitor and record the total cumulative volume of natural gas fuel consumed by the facility on a quarterly basis. Quarterly is defined as a three (3) month period during a calendar year;

4.6 Maintenance of Records

All data monitored as required in Sections 4.3 and 4.5 of Fuel Burning Equipment of this permit shall be recorded in a log that shall be kept on-site for a minimum period of two (2) years and be made available to Department representatives upon request.

5. REPORTING AND RECORDKEEPING REQUIREMENTS

5.1 Test Protocol for Boiler #1

The Permittee shall submit to the Department for approval a test protocol for the performance test required in Section 4.1 of Fuel Burning Equipment of this permit to the Department for approval at least thirty (30) days prior to the test date.

5.2 Performance Specification Test Protocol

If a NO_x CEMS will be installed, the Permittee shall submit to the Department for approval, a protocol for the performance specification test procedure of the CEMS, at least thirty (30) days prior to the test date.

5.3 Performance Test Reports for Boiler #1

The initial performance test report including the required process data, shall be submitted to the EPA and the Department within thirty (30) days of the date on which the performance test is completed.

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**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

0 7 7 - 0 0 0 1 7

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SOURCE

FUEL BURNING EQUIPMENT - BOILER #1, BOILER #2, BOILER #3, BOILER #4, AMUs, AND SPACE HEATERS

5.4 Performance Specification Test Report

If a CEMS is installed, the performance evaluation results of the performance specification test done on the CEMS, shall be submitted to the U.S. Environmental Protection Agency (EPA), Region X, and the Department within thirty (30) days of the date on which the test was completed.

5.5 Predictive NO_x Emissions Monitoring Plan for Boiler #1

If a predictive emissions plan will be used, as per 40 CFR 60.49b(c) the Permittee shall submit to the Department for approval a predictive NO_x emissions monitoring plan, that identifies the operating conditions or parameters to be monitored and maintained, as required in Section 4.2.2 (Fuel Burning Equipment) of this permit. The plan shall be submitted to the Department for approval within 360 days upon the receipt of this operating permit.

- 5.5.1 Identify the specific operating conditions to be monitored and the relationship these operating conditions and NO_x emission rates;
- 5.5.2 Include data and information used to identify the relationship between the NO_x emissions and these operating conditions;
- 5.5.3 Identify how these operating conditions will be monitored on an hourly basis during periods of operation, the format for recording these operating conditions, and the predicted NO_x emissions.

A copy of the predictive NO_x emissions monitoring plan shall be submitted to EPA Department within thirty (30) days after approval by the Department.

5.6 Report of Exceedences for Boiler #1

- 5.6.1 As per 40 CFR 60.49b(h), the Permittee shall submit to EPA, NO_x excess emission reports for any calendar quarter with NO_x exceedences. If no excess emissions occur during the calendar quarter, a semi-annual report shall be submitted stating that no excess NO_x emissions occurred during the semi-annual reporting period.
- 5.6.2 Copies of the NO_x exceedences reports shall also be submitted to the Department.

5.7 Fuel Consumption Report

The Permittee shall submit to the Department an annual fuel consumption report, which shall include the following:

- 5.7.1 The total annual natural gas fuel consumption of the entire facility.

**ISSUED: June 2, 2000
EXPIRES: June 2, 2005**

**AIR POLLUTION OPERATING PERMIT
PERMITTEE, PROJECT, AND LOCATION**

Lamb-Weston Incorporated
Tier II Operating Permit
American Falls, Idaho

PERMIT NUMBER

077 - 00017

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

FUGITIVE EMISSION SOURCES - TRANSFER POINTS, ROADS

1. SOURCE DESCRIPTION

1.1 Process Description

Trucks deliver potatoes to the site. Transfer operations of raw potatoes take place in two (2) enclosed areas, the receiving areas of the main building and the raw storage areas. End products are shipped from the plant site by trucks. Plant roads are largely unpaved, but a portion is paved.

Emissions resulting from the above process and operations are fugitive particulate emissions.

2. EMISSION LIMITS

2.1 Fugitive Emissions

Fugitive emissions generated from transfer points, paved and unpaved roads, and all other sources of fugitive emissions at the facility shall be reasonably controlled in accordance with IDAPA 16.01.01.650, and IDAPA 16.01.01.651 (Rules for the Control of Air Pollution in Idaho).

3. OPERATING REQUIREMENTS

3.1 Control of Fugitive Emissions

Some of the reasonable control precautions may include, but are not limited to, the following:

- 3.1.1 Use of water or environmentally safe chemical dust suppressants;
- 3.1.2 Use of control equipment or enclosures; and
- 3.1.3 Paving of haul roads.

**ISSUED: June 2, 2000
EXPIRES: June 2, 2005**

APPENDIX A
LAMB-WESTON, INCORPORATED - AMERICAN FALLS
HOURLY (lb/hr) AND ANNUAL (T/yr) POINT SOURCE EMISSION LIMITS

SOURCE	PM		PM-10		SO ₂		CO		NO _x		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler #1	---	---	---	---	---	---	---	---	11.04	22.76	---	---
Boiler #2	---	---	---	---	---	---	---	---	6.61	13.61	---	---
Boiler #3	---	---	---	---	---	---	---	---	6.55	13.51	---	---
Boiler #4	---	---	---	---	---	---	---	---	0.21	0.27	---	---
Natural Gas Dryer	---	---	---	---	---	---	---	---	1.16	3.34	---	---
Ducon Scrubber Fryers	5.32	15.31	5.32	15.31	---	---	---	---	---	---	---	---
Kice Filter	0.03	0.08	0.03	0.08	---	---	---	---	---	---	---	---
Pneumafil Filter	0.11	0.32	0.11	0.45	---	---	---	---	---	---	---	---

ISSUED: June 2, 2000
EXPIRES: June 2, 2005

TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the **Rules for the Control of Air Pollution in Idaho**, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the **Rules for the Control of Air Pollution in Idaho**) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 39-111, **Idaho Code**, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e.; air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 16.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior DEQ approval.

The Permittee shall submit a proposed test date for each performance test required by this permit to DEQ for approval at least fifteen (15) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The Permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.

Within thirty (30) days of the date on which a performance test required by this permit is concluded, the Permittee shall submit to DEQ a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by DEQ, which demonstrated compliance with the respective pollutant emission limit unless: (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

ISSUED: June 2, 2000
EXPIRES: June 2, 2005